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ABSTRACT

This audit report addresses whether New York school districts have established comprehensive school safety plans and completed necessary violence-prevention and response steps, and whether the New York State Board of Education and State Education Department provided sufficient monitoring over school districts' efforts to keep schools safe from student violence. The audit indicates that many school districts have not yet formalized such plans. Responses from some districts indicated variation in the inclusion of key plan components and in the extent that they were implementing violence prevention and response steps that support comprehensive school safety plans. Audit recommendations include developing and implementing monitoring capability to ensure compliance with the Safe Schools Against Violence Act and submission of safety plans to the New York Police Department by filing deadlines and in approvable form. Department officials agree with the recommendations and indicate that steps have been or will be taken to implement them. The report concludes with Exhibit A, school districts surveyed; Exhibit B, content of safety plans available for school districts sampled outside of New York City; Appendix A, major report contributors; and comments by New York State Education Department and New York City Board of Education officials, respectively. (RT)

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NEW YORK STATE
OFFICE OF THE STATE COMPTROLLER

H. Carl McCall
STATE COMPTROLLER

NEW YORK STATE EDUCATION DEPARTMENT
NEW YORK CITY BOARD OF EDUCATION

SCHOOL VIOLENCE PREVENTION AND RESPONSE

99-S-43

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Report 99-S-43

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Dear Mr. Hayden and Mr. Levy:

The following is our report addressing the efforts of the State Education Department, the New York City Board of Education and selected school districts to prevent and respond to the risk of violence in schools.

This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution, Article II, Section 8 of the State Finance Law and Article III, Section 33 of the General Municipal Law. Major contributors to this report are listed in Appendix A.

Office of the State Comptroller
Division of Management Audit
and State Financial Services

February 21, 2001

Executive Summary

New York State Education Department
New York City Board of Education
School Violence Prevention and Response

Scope of Audit

Student violence has resulted in tragedies in schools nationwide. Consequently, the public demands that school administrators today focus on the prevention of and response to student violence in schools. To help address this demand, the New York State Education Department (Department) has issued three publications and the New York State Board of Regents have issued one position paper since 1993. For example, the Department's 1996 *Guide for School Safety and Security* (Guide) informs school districts about the basic elements of a school safety plan. Also, in January 1999, the Governor appointed a Task Force on school violence. An October 1999 Task Force report, included six recommendations on comprehensive school safety planning.

The passage of The Safe Schools Against Violence in Education Act (Act) in July 2000, established a statutory requirement for school districts to provide comprehensive school safety plans. For New York City public schools, the Regulations of the Chancellor of the Board of Education (Board) already required each school to prepare an annual safety plan. The New York City Police Department's (NYPD) School Safety Division assumed responsibility for school safety plans in New York City schools in December 1998.

Our audit addressed the following questions about the efforts of the Department, the Board and selected school districts to prevent and respond to school violence for the period January 1, 1998 through May 31, 2000:

- Have school districts established comprehensive school safety plans and completed necessary school violence prevention and response steps?
- Have the Board and the Department provided sufficient monitoring over school districts' efforts to keep schools safe from student violence?

Audit Observations and Conclusions

According to statistics collected by the Department, for the 1997-98 school year (the latest year available at the time of our audit) the State's public schools experienced more than 98,000 school violence incidents. Of that number, more than 1,000 involved homicide, rape, robbery, arson and kidnaping; more than 35,000 involved assault and battery; and more than

6,000 involved weapons possession or the illegal use of drugs, alcohol and tobacco. Clearly, New York, like the rest of the nation, is confronted with a significant school violence problem. We conclude that many schools may not be adequately prepared to prevent and respond to this problem.

While safety experts and the Department have agreed and communicated that comprehensive school safety plans are essential to address the school violence problem, our audit indicates that many school districts have not yet formalized such plans. For example, in response to a survey we took, 31 of 44 districts outside of New York City indicated that comprehensive school safety plans were unavailable. Moreover, responses of the 13 districts that had plans indicated variation in the inclusion of key plan components recommended by safety experts. (See pp. 5-6)

In New York City, all the 1999-2000 school year safety plans were supposed to have been submitted in acceptable form for NYPD review by November 30, 1999. However, as of May 5, 2000, five months after the due date for submitting plans, only 358 schools' plans (31 percent) met the approval of the NYPD. (See pp. 6-8)

Our audit also showed variation in the extent that districts were implementing violence prevention and response steps which support comprehensive school safety plans. The variation pertained to such steps as establishing appropriately diverse school safety teams, maintaining proper incident reporting capability, performing assessments of the safety and security of buildings and grounds, formalizing safety-related policies, and providing appropriate safety training for staff. (See pp. 8-12)

The absence of statutory requirements significantly contributed to the findings that we have identified. While the Department issued guidelines in 1996 and while the Task Force made recommendations for comprehensive school safety planning, responsiveness to this guidance was limited. More progress may have resulted in response to this early guidance if the Department had provided greater monitoring over school district safety planning and violence prevention and response steps. We made recommendations to the Department to develop and implement monitoring capability. This capability will now be necessary to ensure compliance with the Act. We also recommend that the Board reemphasize to schools the requirement that safety plans that are to be submitted to the NYPD by filing deadlines must be in approvable form. (See pp. 13-14)

Comments of Department and Board Officials

Department officials agree with our recommendations and indicate that steps have been or will be taken to implement them. Board officials report that a new computer system addresses our recommendation to the Board concerning the completion of safety plans in a timely manner.

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Introduction

Background

The Board of Regents sets education policies and guides the education system in New York State. The Regents are headed by a Chancellor and are served by the State Education Department (Department). The Department administers education policies and programs, oversees more than 700 local school boards and offers technical assistance to teachers and administrators at local schools. New York City public schools are overseen by the New York City Board of Education (Board). Although the Board is supervised by the Regents, various sections of the State Education Law assign many responsibilities specifically to the Board.

In recent years, student violence has resulted in tragedies in schools throughout the nation. According to Department statistics collected in its incident reporting system, for the 1997-98 school year (the latest year available at the time of our audit), approximately 750 New York State school districts reported more than 98,000 school violence incidents. Of that number, more than 1,000 incidents involved homicide, rape, robbery, arson and kidnaping; more than 35,000 involved assault and battery (including fighting); and more than 6,000 incidents involved weapons possession or the illegal use of drugs, alcohol and tobacco. Because of incidents like these and other widely reported tragedies, the public demands that school administrators today focus attention on the prevention and resolution of school violence.

To help school administrators to address this demand, since 1993 the Regents have issued one position paper, *Action Plan for School Safety and Security*, and Department has issued three publications: *A Study of Safety and Security in the Public Schools of New York State; Violence in the Schools A National, State and Local Crisis; and a Guide for School Safety and Security* (Guide). In January 1999, the Governor appointed a Task Force, headed by the Lieutenant Governor, to study school violence in New York State. In October 1999, the Task Force, issued *Safer Schools for the 21st Century: A Common Sense Approach to Keep New York's Students and Schools Safe*. This report made 25 recommendations, including six pertaining to a comprehensive approach for school safety planning. These six recommendations are consistent with what the Department advocated in its Guide and earlier publications.

In addition, to providing publications and establishing incident reporting, beginning in the 1996-97 State fiscal year, the Department established the Extended School Day/School Violence Prevention program. This program provides school districts with grants which are to be used to help children develop positive social skills, including conflict resolution. In accordance

with this program, grantee districts obtain necessary training from the Upstate Center for School Safety (UCSS) and must establish a school safety plan in at least one district school building. Grants totaled $14.8 million in the 1999-2000 State fiscal year. This program was the only Department initiative requiring implementation of comprehensive school safety plans at the time of our audit fieldwork.

The Regulations of the Chancellor of the New York City Board of Education did, however, require each New York City public school to prepare an annual safety plan. In addition, certain of the Commissioner's Regulations were relevant to a safe school environment. For example, Section 155.17 of the Commissioner's Regulations requires that each school board outside of New York City is to have prepared a school Emergency Management Plan (EMP) by October 1, 1990. These plans are to address disruptions that result from disasters and weather-related emergencies, rather than safety issues posed by student violence. Nevertheless, the response features of the plans could have applicability in situations involving student violence. In addition, Section 100.2 (l) of the Commissioner's Regulations requires every school district in the State to have adopted and implemented a written policy on school conduct and discipline by January 1, 1996. The Regulations require local school boards to review and update both the EMPs and the conduct and discipline policies every year.

After we concluded fieldwork for this audit, The Safe Schools Against Violence in Education Act (Act or Project SAVE) was signed into law by the Governor in July 2000. School districts must be in compliance with its provisions by July 1, 2001. Among the Act's requirements are that local boards of education must adopt and implement: codes of conduct for maintaining order on school property; comprehensive district-wide school safety plans, as well as building-level school safety plans; annual reviews and updates of the code of conduct and the safety plans; and a uniform violent incident reporting system. Local school boards will be required to file their district-wide plans with the Commissioner and their building-level plans with local law enforcement agencies. The Act also requires the Commissioner to annually report to the Governor and Legislature on the status of implementation and compliance.

Audit Scope, Objectives and Methodology

We audited the efforts of the Department, the Board and selected school districts to prevent and respond to school violence for the period January 1, 1998 through May 31, 2000. One objective of our performance audit was to determine whether school districts Statewide have established comprehensive school safety plans. Another objective was to determine

whether school districts completed necessary school violence prevention and response steps. Our objective was also to determine whether the Department and the Board provided sufficient monitoring over school districts' efforts to keep schools safe from student violence. To accomplish our objectives, we reviewed relevant reports and we interviewed appropriate Department, Board, New York City Police Department and school district staff. In addition, we developed a questionnaire on school safety planning that we sent to 50 randomly selected school districts.

The 50 selected districts encompassed a total of 227 schools at all education levels and included four districts administered by the Board (See Exhibit A). We provided the questionnaire to Department and UCSS staff for comment and, where appropriate, we amended it to reflect their views before we issued it. We analyzed the questionnaire results obtained from 48 responding districts. We also visited six school districts covered by our questionnaire: Galway Central, Fonda-Fultonville Central, Rochester City, South Colonie Central, South Huntington Union Free and the Richmond High School District in New York City. While at these school districts, we reviewed and evaluated available school safety plans and the steps taken or underway for prevention and response to school violence.

We conducted our audit according to generally accepted government auditing standards. Such standards require that we plan and do our audit to adequately assess those procedures and operations included within the audit scope. Further, these standards require that we understand the Department's and the Board's internal control systems and their compliance with those laws, rules and regulations that are relevant to the operations included in our audit scope. An audit includes examining, on a test basis, evidence supporting transactions recorded in the accounting and operating records and applying such other auditing procedures as we consider necessary in the circumstances. An audit also includes assessing the estimates, judgments, and decisions made by management. We believe our audit provides a reasonable basis for our findings, conclusions and recommendations.

We use a risk-based approach when selecting activities to be audited. This approach focuses our audit efforts on those operations identified through our preliminary survey as having the greatest probability for needing improvement. Consequently, by design, we use our finite audit resources to identify where and how improvements can be made. Thus, we devote little audit effort to reviewing operations that may be relatively efficient or effective. As a result, our audit reports are prepared on an "exception

basis." This report, therefore, highlights those areas needing improvement and does not address activities that may be functioning properly.

Response of Department and Board Officials to Audit

A draft copy of this report was provided for review and comment to Department and Board officials. The comments of Department and Board officials were considered in preparing this report and are included as Appendix B and Appendix C, respectively.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of Education shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor. We also request that such a report be made by the Chancellor of the New York City Board of Education.

School Safety Initiatives

The Department's publications have identified and communicated that school districts need to prepare comprehensive school safety plans and need to take specific prevention and response steps to address student violence in elementary and high schools. As previously noted, the Regulations of the Chancellor of the Board required New York City public schools to prepare school safety plans. Such communications and Regulations are consistent with the requirements stipulated in the recently enacted Act. Our audit shows, however, that despite the Department's publications, many districts outside of New York City have yet to prepare comprehensive safe school plans. While safe school plans have been required in New York City schools, many of the plans that were prepared were not prepared for approval in a timely manner.

We also found that the Department had not determined whether the districts outside of New York City that received grants for the Extended School Day/School Violence Prevention (ESD/SVP) program actually established school safety plans required for funding. Further, we found some variation in school districts' accomplishment of necessary violence prevention and response steps which have been recommended by safety experts to support comprehensive school safety plans. As a result of these findings, we conclude that there is significant risk that many schools may not be adequately prepared to prevent and respond to student violence such as has been identified through the Department's incident reporting system and has been experienced in recent years in schools throughout the country.

We believe that the absence of a statutory requirement for school safety planning, prior to the Act, significantly contributed to these findings. However, we also believe that more progress may have resulted if the Department had monitored the progress of districts' school safety plans as well as districts' progress to accomplish school violence prevention and response steps. If the Department had effectively monitored the districts, it could, perhaps, have offered assistance to those districts that were not making sufficient progress. Further, the Department could have shared the results of those districts that were making significant progress so that other districts could benefit from this experience. In part, the lack of Department monitoring of school district safety may also have resulted from reorganizations that eliminated the Department Office of Intercultural Relations; the unit responsible for the Guide. In order for the Department

to comply with the Act and to help school districts to address the school violence problem, the Department must establish and maintain the capability to monitor school district safety planning. The Board's requirement that schools establish safe school plans is a positive step. Now the Board's challenge is to have all the plans prepared and approved in a timely manner.

In response to our observations, Department officials stated that school districts obtain information required to establish school safety plans from a variety of means and do not necessarily need to depend on Department monitoring to stay informed. However, Department officials agree that the Act will cause them to reevaluate their monitoring of school district safety planning. They also agree to identify and to share district plans and programs that have been effective in addressing school safety and to more closely monitor the preparation and evaluation of ESD/SVP plans. Board officials stated that steps have been taken to ensure timely preparation and approval of school safety plans. For example, Board officials state that the due dates for the various stages of plan preparation as well as the due dates for review of the plans are now scheduled for earlier in the school year. In addition, the computer, rather than the mail, is now being used to transmit various versions of plans for review. The following presents a more detailed analysis of our findings.

School Safety Plans

Comprehensive school safety plans ensure that a school district has adequately considered the risk of school violence and has officially communicated to all affected parties the policies, procedures and specific responsibilities for addressing the risk. Of the 48 school districts responding to our survey, 44 were outside of New York City. Of these 44, 31 (70 percent) indicated that comprehensive school safety plans were not available. Officials of seven of these districts indicated that, as of March 2000, their districts were in the process of developing comprehensive school safety plans. Only 13 (30 percent) of the responding districts outside of New York City reported actually having comprehensive school safety plans available (See Exhibit A).

When we further inquired about whether the plans of the 13 districts outside of New York City contained key provisions that are recommended by experts, we found the inclusion of such provisions varied. For example, all 13 districts reported that their plans provided for bomb threats, but only nine districts reported that their plans specifically provided for coordination with agencies responsible for ambulance services. While 12 districts reported that their plans included coordination with the police, only four districts reported plans that involved coordina-

tion with local mental health agencies. Further, five districts indicated that their Plans had not been filed with local law enforcement (See Exhibit B).

According to Department officials, beginning with the 1997-98 State fiscal year prospective ESD/SVP districts are required to provide a school safety plan for at least one building within their district. We reviewed the ESD/SVP program files for a judgmental sample of five grantee school districts (the Rochester, Buffalo, Troy, Utica and Roosevelt City School Districts) receiving funding for the 1997-98 and 1998-99 schools years. Neither the Department nor the UCSS, the Department-funded technical assistance provider for the program, could provide documentation to show that Troy had developed and submitted the safety plan required for at least one of its school buildings. In addition, the Department had not determined whether the plans developed by the districts were actually implemented.

Consistent with the Regulations of the Chancellor of the New York City Board of Education, the responses of four districts in New York City that were included in our questionnaire survey indicated the availability of comprehensive safe school plans. In this regard, in December 1998 the Safety Planning Unit (Unit) of the New York City Police Department's (NYPD) School Safety Division assumed responsibility for the review and approval of New York City school safety plans. The Unit developed a template to be used by all New York City schools when preparing their school safety plans. The template provided for such items as: the school safety plan committee members and meeting dates, phone numbers of various emergency contacts, the chain of command to be followed in the absence of the school principal, the number of teachers and students in the school, controls over admission at school entrances, school security guard assignments, visitor control procedures, intruder procedures, emergency contingency plans, and metal detector scanning procedures.

In June 1999, the Unit collected the plans of the 1,226 schools required to prepare plans for the 1998-99 school year, regardless of their completion status. NYPD data for the 1998-99 school year shows that the plans of 600 (49 percent) schools were approved and the plans of 626 (51 percent) schools had not been approved. According to NYPD officials, completed school safety plans for the 1999-2000 school year were to be provided to the Board's District Offices by November 30, 1999 for review by Unit staff. NYPD data for the 1,162 schools required to submit plans for the 1999-2000 school year shows that, as of May 5, 2000, the plans of 358 (31 percent) schools were approved; the plans of 717 (62 percent)

schools were submitted, reviewed and returned for correction and the plans of 87 (7 percent) schools were either not submitted or were not submitted in acceptable form for review.

Consequently, only 31 percent of the schools had NYPD approved plans as of May 2000, more than five months after the due date for submitting plans for review. Nevertheless, the Board's partnering with the NYPD should enhance the quality of school safety plans. In addition, the use of a plan template and the recent use of computer technology for transmission of the plans are best practices which the Department ought to consider for districts outside of New York City.

Violence Prevention and Response Steps

From the 48 school districts responding to our school safety survey questionnaire and from our site visits to six school districts, we determined that school district progress varies in implementing fundamental steps for school violence prevention and response. The following paragraphs illustrate our audit results.

School Safety Teams - Safety planning benefits from the experience and perceptions of a diverse team which includes school personnel, parents and community members including the police and mental health care professionals.

- Questionnaire responses from nine school districts indicated that school safety teams were not established. (Amagansett UFSD, Belfast CSD, Bridgehampton UFSD, Germantown CSD, Gloversville City SD, Copiague UFSD, Mount Sinai UFSD, Port Byron CSD and Pulaski CSD)

- Of the 39 districts with questionnaire responses indicating the presence of school safety teams, 24 districts reported that their teams did not include parents and community representatives. (Cheektowaga-Sloan UFSD, Clinton CSD, Commack UFSD, Fillmore CSD, Fonda-Fultonville CSD, Franklin CSD, Galway CSD, Garrison UFSD, George Junior Republic UFSD, Georgetown-South Otselic CSD, Hinsdale CSD, Delaware Valley/Jefferson-Youngsville/Narrowsburg CSD, Kinderhook CSD, Levittown UFSD, New York City Community School District Number 3, New York City Community School District Number 8, New York City Community School District Number 9, Oneida City SD, Owego-Apalachin CSD, Plainedge UFSD, Rochester City SD, Sauquoit Valley CSD, Scarsdale UFSD, and South Huntington UFSD)

Compliance with the Commissioner's Regulations - The Commissioner's Regulations for EMPs and for Policies on School Conduct and Discipline are relevant to school safety planning.

- Of districts responding to our survey questionnaire, only Garrison UFSD reported not establishing an EMP.

- All 48 districts responding to our survey questionnaire indicated that policy on school conduct and discipline had been established.

- Questionnaire responses from four districts with EMPs indicated that these plans are not reviewed and updated annually. (Amagansett UFSD, Delaware Valley/Jefferson-Youngsville/Narrowsburg CSD, Springville-Griffith Institute CSD, and Town of Webb UFSD)

- Questionnaire responses from 11 districts with discipline and conduct policies indicated that these policies are not reviewed and updated annually. (Clinton CSD, Commack UFSD, Garrison UFSD, Copiague UFSD, Levittown UFSD, Northport-East Northport UFSD, Oneida City SD, Port Byron CSD, Rochester City SD, Roundout Valley CSD, and Scarsdale UFSD)

- Of the districts that we visited only South Colonie did not have a copy of the EMP in one of its buildings.

- Three of the districts that we visited could not provide support that the local board of education had reviewed the EMP or the conduct and discipline policies. (Galway CSD, Rochester City, and South Huntington UFSD)

Incident Reporting - Incident reporting can be used to identify potential problem areas in a school, account for incidents that do occur, notify administrators and board of education officials about problems and to help determine the types of intervention and prevention programs that may be needed.

- Questionnaire responses from nine school districts indicated that incident reporting systems were not in place. (Bridgehampton UFSD, Cheektowaga-Sloan UFSD, Fillmore CSD, Jefferson CSD,

Lisbon CSD, Mount Sinai UFSD, Pulaski CSD, Sauquoit Valley CSD, and Town of Webb UFSD)

- Questionnaire responses from nine districts with incident reporting systems indicated that incident reports were not prepared for review by the school board or school administrators. (Amagansett UFSD, Fonda-Fultonville CSD, Garrison UFSD, George Junior Republic UFSD, Owego-Apalachin CSD, Plainedge UFSD, South Colonie CSD, South Huntington UFSD, and Williamson CSD)

- Questionnaire responses from Bridgehampton UFSD and Town of Webb UFSD indicated that incident reports were not referred to law enforcement officials.

- Questionnaire responses of 19 school districts indicated that incident reports were not provided to the Department. (Alden CSD, Amagansett UFSD, Brasher Falls CSD, Bridgehampton UFSD, Cheektowaga-Sloan UFSD, Copiague UFSD, Fonda-Fultonville CSD, George Junior Republic UFSD, Georgetown-South Otselic, Gloversville City SD, Delaware Valley/Jefferson-Youngsville/Narrowsburg CSD, Kinderhook CSD, New York City Community School District Number 3, Port Byron CSD, Pulaski CSD, Roundout Valley CSD, Sauquoit Valley CSD, South Colonie CSD, and Springville-Griffith Institute CSD)

- Of the school districts that we visited, only Fonda-Fultonville CSD did not have an incident reporting system.

Assessment of the Safety and Security of Buildings and Grounds - An assessment of the safety of school buildings and grounds along with a review of programs, policies and procedures related to these premises is recommended to help school districts prepare comprehensive school safety plans.

- Questionnaire responses from 12 school districts indicated that a formal school safety assessment was not available. (Bridgehampton UFSD, Cheektowaga-Sloan UFSD, Clinton CSD, Fillmore CSD, Fort Edward UFSD, Franklin Square UFSD, Garrison UFSD, Copiague UFSD, Kinderhook CSD, Lisbon CSD, Mount Sinai UFSD and Town of Webb UFSD) However, Franklin Square UFSD and Garrison UFSD indicated that preparation of a school safety assessment was underway.

- All six districts that we visited indicated they had completed an assessment of the safety and security of buildings and grounds. With the exception of South Colonie CSD, these were assessments of the physical plant only. South Colonie officials indicated that local police had recently completed a school safety assessment using a comprehensive school safety checklist.

Development of Safety-Related Policies - School districts should prepare safety-related policies to address potential crisis situations from violent behavior by students.

- Of the 48 districts responding to our survey questionnaire, all reported having a comprehensive set of safety policies pertaining to school conduct and discipline, and all but Garrison UFSD reported having a policy pertaining to weapons.

- Seven districts responding to our survey reported not having a bomb threat policy. (Bridgehampton UFSD, Garrison UFSD, Mount Sinai UFSD, Plainedge UFSD, Port Byron CSD, Pulaski CSD and Williamson CSD)

- Hostage situation policies were reportedly not available in 29 of the 48 districts responding to our survey. (Amagansett UFSD, AuSable Valley CSD, Belfast CSD, Bridgehampton UFSD, Clinton CSD, Commack UFSD, Fillmore CSD, Fonda-Fultonville CSD, Fort Edward UFSD, Franklin Square UFSD, Garrison UFSD, George Junior Republic UFSD, Germantown CSD, Delaware Valley/Jefferson-Youngsville/Narrowsburg CSD, Jefferson CSD, Levittown UFSD, Lisbon CSD, Mount Sinai UFSD, Oneida City SD, Plainedge UFSD, Port Byron CSD, Pulaski CSD, Richmond High Schools District, Rochester City SD, Rondout Valley CSD, South Colonie CSD, Springville-Griffith Institute CSD, Town of Webb UFSD and Williamson CSD)

- Thirty responding districts reported not having a policy pertaining to kidnaping. (Amagansett UFSD, AuSable Valley CSD, Belfast CSD, Bridgehampton UFSD, Cheektowaga-Sloan UFSD, Clinton CSD, Commack UFSD, Fillmore CSD, Fonda-Fultonville CSD, Fort Edward UFSD, Franklin Square UFSD, Garrison UFSD, George Junior Republic UFSD, Georgetown-South Otselic CSD, Germantown CSD, Gloversville City SD, Hinsdale CSD, Delaware Valley/Jefferson-Youngsville/Narrowsburg CSD, Jefferson CSD,

Levittown UFSD, Lisbon CSD, Mount Sinai UFSD, Oneida City SD, Plainedge UFSD, Port Byron CSD, Pulaski CSD, Richmond High Schools District, Rochester City SD, Town of Webb UFSD and Williamson CSD)

Intervention and Prevention Plans - Intervention and prevention plans are considered the key to an effective school safety strategy. Intervention and prevention plans in the following nine areas; alcohol and drugs, conflict resolution, at-risk youths, social skills assessment, peer mediation, anger management, mentor relations, diversity awareness and gang recognition are among the key areas requiring such plans.

- The six districts that we visited as well as the 48 districts that we surveyed generally had provided for most of the recommended intervention and prevention plans.

Staff Training - All school district staff should have training to help them fulfill their roles in comprehensive school safety planning. In particular, staff should be trained to recognize and respond accordingly to the signals of potential problems with safety implications.

- Of the 48 districts responding to our survey, only nine did not indicate the presence of regular staff training sessions on the topic of school safety. (Brasher Falls CSD, Bridgehampton UFSD, Clinton CSD, Copiague UFSD, Fillmore CSD, Fort Edward UFSD, Garrison UFSD, South Huntington UFSD and Town of Webb UFS)

- All six of the school districts that we visited indicated having provided their staff with training related to school safety and violence prevention.

Recommendations

To the Department:

1. Establish and maintain the policies and procedures necessary to permit the Department to effectively monitor school districts' safety plans and violence prevention and response steps in a manner consistent with the requirements of the Act.

2. Establish procedures and documentation requirements that provide a basis for verifying that ESD/SVP grantee districts have prepared and implemented school safety plans in compliance with program funding requirements.

3. Identify and share school districts' best practices for comprehensive school safety plans and violence prevention and response initiatives.

4. Provide assistance to those districts not making sufficient progress in either establishing school safety plans or implementing violence prevention and response steps. In this regard, utilize the results of field visits and questionnaire analysis that is presented in this report.

5. Consider whether the Board's approach to school safety plans which relies on a plan template and computer transmission of plans can be applied to the Department's oversight of school districts outside of New York City.

(Department officials agree with recommendations number 1 through number 5. They indicate that steps have been or will be taken to implement them.)

Recommendations (Continued)

To the Board:

6. Reemphasize to schools the requirement that safety plans that are to be submitted to the NYPD by filing deadlines must be in approvable form.

   (Board officials responded that the Division of School Safety and Prevention Services developed and installed an online safety system called EASYSSP to ensure that school safety plans are completed in a timely manner. They indicate that schools are now able to have customized plans and management has the capability to track and identify in real time the status of each school's safety plan. Board officials state the EASYSP is a first of its kind in the nation and has a web-based interface making information available for immediate use by critical responding agencies. The Board attributes many improvements in operational efficiency and effectiveness to the new system including 62 percent of schools having approved plans in December of 2000 as opposed to seven percent in December 1999.)

SCHOOL DISTRICTS COVERED BY QUESTIONNAIRE SURVEY
RESPONSES ON THE AVAILABILITY OF COMPREHENSIVE WRITTEN SAFETY PLANS

Safety Plans Available	Safety Plans Not Available
1. Amagansett Central	18. Alden Central
2. AuSable Valley Central	19. Belfast Central
3. Fonda-Fultonville Central	20. Brasher Falls Central
4. Galway Central	21. Bridgehampton Union Free
5. George Junior Republic	22. Cheektowaga-Sloan Union Free
6. Germantown Central	23. Clinton Central
7. Lisbon Central	24. Commack Union Free
8. Monroe-Woodbury Central	25. Copiague Union Free
9. New York City Community #3	26. Fillmore Central
10. New York City Community #8	27. Fort Edward Union Free
11. New York City Community #9	28. Franklin Central
12. Oneida City	29. Franklin Square Union Free
13. New York City Richmond H.S.	30. Garrison Union Free
14. Rochester City	31. Georgetown-South Otselic
15. Rondout Valley Central	32. Gloversville City
16. South Colonie Central	33. Hinsdale Central
17. South Huntington Union Free	34. Jeff-Youngsville/Delaware/Narrowsburg
	35. Jefferson Central
	36. Kinderhook Central
	37. Levittown Union Free
	38. Mount Sinai Union Free
	39. Northport-East Northport
	40. Owego-Apalachin Central
	41. Plainedge Union Free
	42. Port Byron Central
	43. Pulaski Central
	44. Sauquoit Valley Central
	45. Scarsdale Union Free
	46. Springville-Griffith Institute Central
	47. Town of Webb Union Free
	48. Williamson Central

Notes: Six school districts in **bold** were visited.

Two of 50 surveyed school districts, Freeport Union Free and Mattituck-Cutchogue Union Free, did not respond to our survey.

Four of the 17 school districts with safety plans available were in New York City; Community #3, Community #8, Community #9 and Richmond H.S.

Exhibit A

CONTENT OF SAFETY PLANS AVAILABLE FOR SCHOOL DISTRICTS
SAMPLED OUTSIDE OF NEW YORK CITY

Items Addressed and/or Included in Safety Plans	Amagansett	AuSable Valley	Fonda-Fultonville	Galway	George Junior	Germantown	Lisbon	Monroe-Woodbury	Oneida City	Rochester City	Rondout Valley	South Colonie	So Huntington	Totals
Zero Tolerance			Y		Y			Y			Y	Y	Y	6
Violation Penalties		Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	11
Student Behavior	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	12
School Climate		Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	11
Supervision/Management		Y	Y		Y	Y	Y	Y	Y	Y	Y		Y	10
Emergency Response	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	12
Bomb Threats	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	13
Armed Person		Y	Y	Y		Y		Y			Y	Y		7
Hostage Situation	Y	Y	Y	Y		Y		Y			Y	Y	Y	9
Kidnaping			Y	Y		Y		Y			Y	Y	Y	7
Intruders		Y	Y	Y		Y		Y	Y	Y	Y	Y	Y	10
Disruptive Student Policy		Y	Y	Y	Y	Y		Y	Y	Y	Y	Y		10
Assault Policy		Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	11
Security Policy		Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	11
Training	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	12
Student/Parent Involvement	Y	Y	Y	Y				Y		Y	Y	Y	Y	9
Floor Plans	Y	Y	Y	Y		Y	Y	Y	Y		Y	Y	Y	11
Coordination with Agencies														
Police	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	12
Fire	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	12
Ambulance Service	Y	Y	Y	Y		Y		Y			Y	Y	Y	9
Red Cross	Y		Y	Y				Y		Y				5
Parents Association	Y	Y	Y	Y			Y					Y	Y	7
Student Committee	Y	Y	Y	Y			Y					Y	Y	7
Bus Service			Y				Y	Y	Y	Y	Y	Y	Y	8
Custodial Staff	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	10
Mental Health	Y	Y								Y			Y	4
Filed with Police		Y	Y	Y		Y		Y	Y			Y	Y	8

Notes: A "Y" indicates that the plan does address and/or include the item. The absence of a "Y" indicates that the plan does not address and/or include the item.

Exhibit B

Major Contributors to This Report

Jerry Barber
Brian Mason
Tom Trypuc
Tom Kulzer
Todd Seeberger
Legendre Ambrose
Jeffery Dormond
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Appendix A

THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

Chief Operating Officer
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December 21, 2000

Mr. Jerry Barber
New York State Office of the State Comptroller
A.E. Smith Office Building, 13th Floor
Albany, New York 12236

Dear Mr. Barber:

This is in response to the recommendations contained in the "School Violence Prevention and Response" Draft Audit Report (99-S-43) resulting from your audit of the State Education Department's School Safety Plans.

1. *Establish and maintain the policies and procedures necessary to permit the Department to effectively monitor school districts' safety plans and violence prevention and response steps in a manner consistent with the requirements of the Act.*

   We agree with the recommendation. In response to the SAVE legislation, there is an interagency workgroup (SED, DCJS, State Police, OMH, New York State Center for School Safety [NYSCSS], New York City Board of Education and Lt. Governor's Office) that is meeting to:

   - design the format to be provided to schools for the development of their comprehensive school safety plans;
   - prepare a checklist to be used for review of the district plans; and
   - advise on the process for reviewing the district plans.

2. *Establish procedures and documentation requirements that provide a basis for verifying that ESD/SVP grantee districts have prepared and implemented school safety plans in compliance with program funding requirements.*

   We agree with the recommendation. The Department will consider substituting the SAVE requirements for district safety plans and building emergency plans for the existing requirement in the ESD/SVP RFP for a building safety plan. The SAVE plans will be reviewed in a process defined through the interagency work described above. The Department will consider on-site review of the implementation of school safety plans in a random sample of ESD/SVP schools conducted by the NYSCSS.

Appendix B

3. *Identify and share school districts' best practices for comprehensive school safety plans and violence prevention and response initiatives.*

We agree with the recommendation. The Department and the NYSCSS will work cooperatively to identify and share best practices through the Safe Spaces/Learning Places quarterly newsletter prepared by the NYSCSS as well as through the NYSCSS website.

4. *Provide assistance to those districts not making sufficient progress in either establishing school safety plans or implementing violence prevention and response steps. In this regard, utilize the results of field visits and questionnaire analysis that is presented in this report.*

We agree with the recommendation. NYSCSS and the Coordinated School Health Network regional and statewide offices will provide technical assistance for the implementation of the SAVE legislation to school districts.

The Department will use the results of field visits and consider the use of questionnaire analysis.

5. *Consider whether the Board's approach to school safety plans which relies on a plan template and computer transmission of plans can be applied to the Department's oversight of school districts outside of New York City.*

We agree with the recommendation. The interagency workgroup mentioned in #1 is preparing a template for the district safety plans and exploring the feasibility of computer transmission of the plans.

If you need any additional information, please have your staff contact Rebecca Gardner or John Soja at (518) 486-6090.

Sincerely,

Richard H. Cate

cc: Rebecca Gardner
John Soja

BOARD OF EDUCATION OF THE CITY OF NEW YORK
HAROLD O. LEVY, *Chancellor*

OFFICE OF THE CHANCELLOR
110 LIVINGSTON STREET - BROOKLYN, NY 11201

January 22, 2001

Mr. Jerry Barber, Audit Director
Office of the State Comptroller
Bureau of Management Audit
A.E. Smith State Office Building
Albany, N.Y. 12236

Re: NYS Comptroller's Draft Audit Report on SED and BOE's Violence Prevention and Response (99-S-43)

Dear Mr. Barber:

Enclosed is the Board of Education's Division of Student Safety and Prevention Services' (DSSPS) response to the recommendation made in the above report.

DSSPS developed and installed an on-line school safety system called EASYSSP to ensure that school safety plans are completed in a timely manner. This system, the first of its kind in the nation, collects school safety information electronically for immediate accessibility. Schools are now able to have customized plans and management has the capability to track and identify in real time the status of each school's safety plan.

The division continues to seek enhancements to the system, and believes that this is a major step in securing the safety of our million-plus students and one hundred thousand-plus employees.

We welcome the opportunity to demonstrate the capabilities of our new system.

Sincerely,

Burton Sacks
Chief Executive

BS:ck
Enclosure

c: Harold O. Levy
Birdie Blake-Reid
Jess Fardella
Judith Rizzo
William Casey
Gregory Thomas
Chad Vignola
David Klasfeld

Appendix C

BOARD OF EDUCATION OF THE CITY OF NEW YORK
Harold O. Levy, *Chancellor*

OFFICE OF THE CHIEF EXECUTIVE
110 LIVINGSTON STREET – BROOKLYN, NY 11201

GREGORY A. THOMAS
EXECUTIVE DIRECTOR

January 22, 2001

Mr. Jerry Barber
Director of State Audits
Office of the State Comptroller
Bureau of Management Audit
A.E. Smith State Office Building
Albany, N.Y. 12236

Dear Mr. Barber:

As discussed in the exit conference held on December 28, 2000, we believe that we have taken notable measures to address your concerns about the timeliness of preparation and approval of school based safety plans. As detailed in my letter of August 1, 2000 in response to your preliminary audit findings, we too recognized the need to develop a system to ensure that school safety plans were completed in a more timely fashion.

To that end, in the Spring of 2000, we began to develop plans to provide school administrators, superintendents at the district level and staff from the New York City Police Department's School Safety Division (NYPD/SSD), with the ability to prepare and approve safety plans using web-based technology. This on-line school safety system (called EASYSSP) is the first of its kind in the nation and is designed to collect data and have school safety information electronically accessible and available for immediate use by critical responding agencies through a web-based interface.

We are pleased to report that with the start of the 2000-2001 school year, we were successful in the full implementation of this on-line system and have since realized numerous system-wide advantages. Through this technology, school based administrators are now able to prepare the required information through an "on-line interview process" which reduces errors, thereby minimizing the need for multiple revisions to their safety plans. Moreover, since the basic data is retained in the system, the development of safety plans in subsequent years will not require a reproduction of data, but merely an updating of information. The EASYSSP also affords schools the opportunity to have customized plans, eliminating the previous "one-size fits all" version. To assist school administrators with this new system, a sixty-page step by step/screen by-screen manual was developed. In addition to training and technical assistance provided by central office representatives, an on-line chat room was created to provide live responses to questions.

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After school administrators complete a school safety plan, it is immediately available for review and on-line approval by the appropriate district superintendent. Once approved by the superintendent, safety plans are electronically available for review and final approval by the NYPD/SSD. Once safety plans have been approved by the NYPD/SSD, they are then available for use by response teams in the case of an emergency. The advantages of implementing the EASYSSP are evident in our ability to track and identify the status of each and every school safety plan in real time. During prior years, a manual survey would have to be conducted to determine the status of each plan. With the use of EASYSSP, we are able to enhance our ability to inform management of those plans that are still in development versus those that are progressing through the final approval stages.

A comparison of statistics from December 1999 and December 2000 reveals a significant increase in productivity and accountability. Specifically, in December of 1999 less than seven (7) percent of the one thousand, two hundred schools (1200) in the Board of Education had approved their safety plans. In December 2000, sixty-two (62) percent of schools had approved their plans. This represents a significant increase in the number of safety plans ready for superintendent review and approval. When this increase is coupled with the fact that these plans were produced three months earlier than last school year, it represents a dramatic increase in efficiency.

While we continue to conduct ongoing enhancements to the EASYSSP, we believe that it represents a major step in the security of knowing that the safety and welfare of our system's one million, one thousand (1,001,000) students and more than one hundred thousand (100,000) staff members is adequately addressed. We have in fact received numerous commendations and requests for assistance from our educational colleagues nationwide. Moreover, officials who have been charged with assisting school districts throughout the state in conjunction with the school safety legislation recently enacted by Governor Pataki have sought our assistance.

We welcome the opportunity to provide you and your staff with a hands-on demonstration of the EASYSSP at your convenience. Once again, we thank you for the professionalism demonstrated by your staff during the audit process. If we can be of any further assistance, please feel free to contact us.

Sincerely,

Gregory A. Thomas
Executive Director

c: Burton Sacks
Chad Vignola
Michael King
Deputy Chief Raymond Diaz

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